

IN RE:	:	CHAPTER 13
CHARLES SMITH BRADDY	:	
aka Charlie Braddy	:	CASE NO. 1:17-bk-02781
Debtor	:	
	:	
NATIONSTAR MORTGAGE LLC DBA	:	
MR COOPER,	:	
Movant	:	
	:	
v.	:	
	:	
CHARLES SMITH BRADDY	:	
aka Charlie Braddy	:	
JANINE GARNETT,	:	
Respondents	:	

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted that the filing of a bankruptcy petition acts as a stay upon certain foreclosure actions.
6. Admitted.
7. Proof of amounts owed is demanded at trial and this paragraph is therefore denied..
8. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtor's research of payments made.
9. Proof of default is demanded at trial and this paragraph is therefore denied, pending Debtor's research of payments made.

10. Denied that Movant has demonstrated cause for relief.
11. Movant has failed to satisfy all of the elements of Bankruptcy Code § 506(b) and allegations that the Debtor is responsible for payment of attorney fees and costs are therefore denied.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Dorothy L. Mott

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